

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (AKRON)

In re:

ROBERT CUMMINGS,

Debtor.

CHAPTER 7 CASE NO.: 19-50189

JUDGE: ALAN M. KOSCHIK

**MOTION FOR ADDITIONAL TIME TO
FILE MISSING DOCUMENTS**

Debtor Robert Cummings, through counsel, respectfully moves this Court for an additional two (2) weeks to file the missing documents in his case. In support, he states that in collecting additional information after his January 31 filing, and based on recent contact from a creditor of his wife's, Mr. Cummings believes that he may need to move to convert the case to a Chapter 13 and also that his wife may be filing to be joined in that same Chapter 13. Accordingly, he respectfully requests two (2) additional weeks—until February 28, 2019—to submit the missing documentation, motion to convert, and a proposed Chapter 13 Plan.

Mr. Cummings believes that no creditors will be prejudiced by this brief delay as his intention is to convert to a Chapter 13 which will result in payments to his creditors, and no garnishment, foreclosure, or other active collection efforts were halted by the filing.

The Chapter 7 Trustee, Harold Corzin, indicated by phone call on February 14, 2019, that he does not object to this request.

Respectfully submitted,

/s/ Rebecca J. Sremack

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Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2019, a copy of the foregoing *Motion for Additional Time to File Missing Documents* was filed electronically via this Court's ECF system and served upon all parties indicated on the electronic filing receipt, including:

The Chapter 7 Trustee (Harold A. Corzin)
The U.S. Trustee

It was also sent this same day by regular mail to the following:

Timbertop Condominium No. 2
333 S Main St Ste 702
Akron OH 44308-1228

Target
PO Box 9500
Minneapolis, MN 55440-9500

Capital One Bank
PO Box 6492
Carol Stream IL 60197-6492

Capital One Bank USA NA
ATTN: General Correspondence
PO Box 30285
Salt Lake City UT 84130-0285

Old Navy
PO Box 965004
Orlando, FL 32896-5004

PNC Bank
6750 Miller Road
Brecksville OH 44141-3239

/s/ Rebecca J. Sremack

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Counsel for Debtor